



April 26, 2010

Mr. Scott Miller
Remedial Project Manager
Superfund Division
Superfund Remedial Branch
Section C
U.S. EPA Region 4
61 Forsyth Street, SW
Atlanta, GA 30303

**Re: Amended Additional Off-Site Soil Sampling – Western Grid
Cabot Carbon/Koppers Superfund Site
Gainesville, Florida**

Dear: Mr. Miller

On behalf of Beazer Inc. (Beazer), AMEC Earth and Environmental (AMEC) is providing this revised proposal for additional off-Site soil samples to the west of the Cabot Carbon/Koppers Superfund Site (Site) in Gainesville, Florida. The proposed sampling locations presented in this letter supersede the proposed sampling locations presented in my February 19, 2010 letter to you. The sampling locations proposed in this plan reflect changes based upon comments from Dr. John Mousa of Alachua County Environmental Protection Department (ACEPD) dated March 17, 2010, comments from Ms. Kelsey Helton of the Florida Department of Environmental Protection (FDEP) dated April 15, 2010, and comments discussed during a conference call on April 15, 2010 attended by representatives of U.S. EPA, Beazer, FDEP, ACEPD, ARCADIS, AMEC, the City of Gainesville, and other stakeholders. The remainder of this letter responds to each of the ACEPD and FDEP comments and explains whether and how the proposed sampling plan was modified. Other than the modifications discussed below, the proposed additional off-Site sampling to the west of the Site will follow the approach described in the February 19, 2010 letter to you.

FDEP suggested adding 10 samples approximately 50 feet to the west of the western boundary of the Site, as FDEP believes that such samples may be helpful in refining the vertical delineation of dioxin/furans. As noted in the February 19, 2010 letter and also on **Figure 1** (attached), the proposed sampling plan calls for collection and standard 21-day analysis of five 0-6" and 6-24" samples approximately 100 feet west of the western boundary of the Site (shown as blue triangles on **Figure 1**). The purpose of these samples is to provide information on the vertical extent of dioxins and furans to the west of the Site. As indicated in the February 19, 2010 letter, based on the results of the initial five 6 – 24" samples, and in consultation with the US EPA, Beazer has already proposed to analyze up to 10 additional 6 – 24" samples to evaluate the vertical extent of dioxins. If dioxin/furan concentrations at the five 6-24" sample locations currently proposed do not exceed SCTLs, then additional 6-24" samples closer to the boundary of the Site may be collected. Such

additional sampling can be conducted as part of the predesign activities, if such sampling is determined to be necessary.

FDEP observes that on-Site samples closest to the property boundary have TCDD-TEQ concentrations above the default residential SCTL of 7 parts per trillion (ppt), and requests three more samples along the southern quarter of the western property boundary. The southernmost sampling location proposed in the existing sampling plan paralleled one of the existing on-Site sampling locations so an additional off-Site sample at that location is not necessary. Two additional off-Site sampling locations have been added in response to FDEP's request. The first of the additional off-Site locations is 200 feet south of the most southerly previously proposed grid sample, and the second additional off-Site location is 400 feet south (**Figure 1**). At both of these off-Site locations, samples will be collected from both the 0 – 6" and the 6 – 24" depth interval. The 0 – 6" samples will be submitted for analysis with a standard 21-day turn-around time. Samples from the 6 – 24" depth interval will be submitted to the laboratory on hold.

Both FDEP and ACEPD have requested additional samples on properties to the north of the Site that lie between the northern Site boundary and the existing off-Site samples located 100 feet from the northern Site boundary that are below the default 7 ppt residential SCTL. Additional sampling of these properties is not necessary at this time given that:

- the recently collected on-Site samples just inside the fenceline had an average TCDD-TEQ concentration of less than the default residential SCTL of 7 ppt;
- the highest on-Site fenceline concentration was only slightly (about 15%) greater than the default residential SCTL;
- all the samples collected along NW 33rd Avenue to the north of the Site have an average TCDD-TEQ concentration of about 3 ppt, which is less than half of the default residential SCTL; and,
- the average concentration of the three on-Site fenceline samples and three parallel samples on NW 33rd Avenue is about 5 ppt, which is less than the default residential SCTL.

Together, these data provide strong indication that the average concentration of TCDD-TEQ in surface soil on the properties abutting the northern Site boundary is less than the default residential SCTL of 7 ppt. Additional sampling is not necessary at this time. Additional predesign sampling may be necessary to further refine off-Site surface soils that may be remediated and, such sampling may include properties along the northern boundary of the Site.

ACEPD requested that an additional sample be collected to the west of the existing sample on NW 31st Ave. The westernmost existing sample (SS52AA) has a TCDD-TEQ concentration of 6.9 ppt, which is less than the default residential SCTL of 7 ppt. Therefore no need exists to collect an additional sample because TCDD-TEQ along NW 31st Avenue has been delineated.

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ACEPD also requested that in cases where two grid samples are located along a property boundary common to two properties that an effort be made to not have two samples from the same property but instead, to have one sample collected from each of the two properties. Approximately 10 grid samples have been moved a few feet to accommodate this request (**Figure 1**).

Should you have any questions or concerns, please don't hesitate to contact Mitchell Brouman of Beazer (412-208-8805).

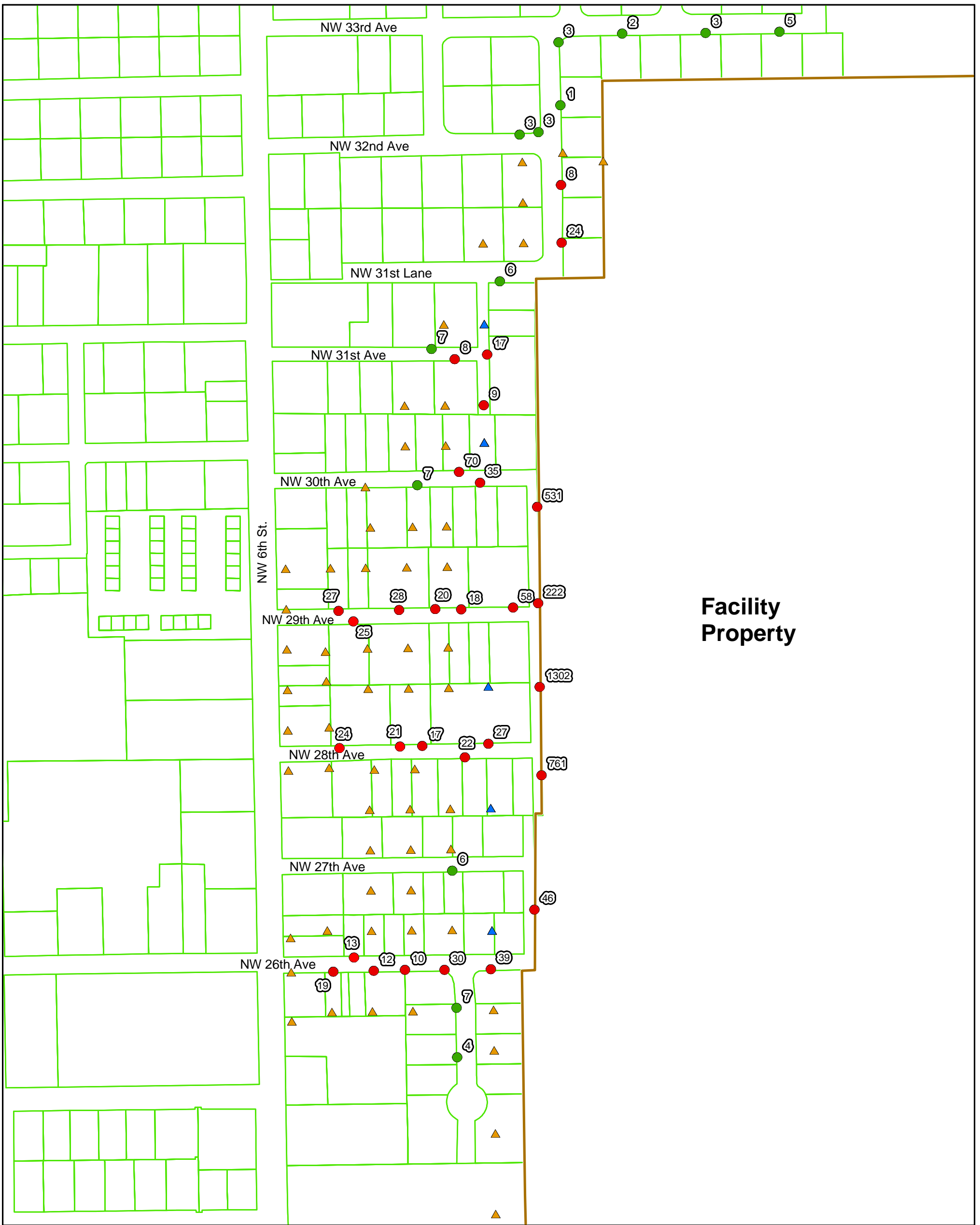
Sincerely,

A handwritten signature in black ink, appearing to read "Joseph Robb". The signature is fluid and cursive, with a large initial "J" and "R".

Joseph Robb, P.G.
Associate Project Manager and Hydrogeologist
AMEC Earth and Environmental

Enclosure

cc:
Mitchell Brouman, Beazer East, Inc.
Paul Anderson, ARCADIS, Inc.
Greg Council, GeoTrans, Inc.
Tim Wolfson, Babst Calland Clements & Zomnir, PC



**Facility
Property**

Location of Study Area

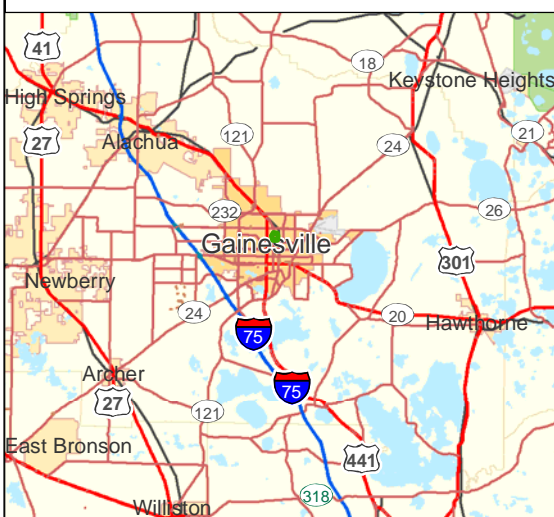


Figure 1

Proposed Off-Site
Sample Locations to the West
Cabot Carbon/Koppers
Gainesville, Florida
Beazer East, Inc.
Pittsburgh, Pennsylvania

Notes & Sources

Legend

- Dioxin ng/kg**
- ≤ 7
- > 7
- ▲ Proposed Sample Locations 0-6" and 6-24"
- ▲ Proposed Sample Locations 0-6" and 6-24" (deeper sample submitted to lab on hold)
- ▭ Koppers Boundary
- ▭ Parcels
- ④⑥ Sample result for 2,3,7,8 tetrachloro dibenzo(p)dioxin toxic (TCDD-TEQ) equivalent calculated using the 2005 World Health Organization toxic equivalency factors (validated)



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